

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHER DISTRICT OF ILLINOIS

FEB 26 2008

FILED

Name of first plaintiff in the case, et al.,

Bobby Lee Harrison, ID#: 20040072892

V.

FEB 26 2008 County of Cook, a municipal Corporation

Name of first defendant declaration] and

MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

Defendants,

THOMAS DART, Sheriff of the Cook County Jail

SALVADOR GODINEZ, Executive Director of the Cook County Jail

CHESTER PLAXICO, Superintendent of the Division 10 E2

DECLARATION Pertaining
To: Shower Cold-Water.

Name of person Making

Bobby Lee Harrison

Judge Name: Kennelly

Attorney Name: [REDACTED]

Civil Action No: 08C 0920

Full name of Detainees or other person making the statement

① Name: Amilcar Rodriguez ID: 20050038475 ⑤ Name: Charles Simmlon ID: 20060042341
 ② Name: Bree Williams ID: 20030015588 ⑥ Name: BRIAN BUCHANAN ID: 20060004242
 ③ Name: Charles Ester ID: 20060010102 ⑦ Name: MARVIN POWELL ID: 2006-0093725
 ④ Name: James Gardner ID: 20040053384 ⑧ Name: ID:

We are witnesses and will testify to the foregoing: This declaration is pertaining to the shower on Tier 62. I was transferred to div. 1 tier 6-2 on Sept, 2006. The first detainee, I spoken to said: "There was no hot water in the shower, and that if you're lucky to be the first detainee into the shower when the doors roll, sometime you may be able to get a warm shower". Myself personal, I've filed numerous grievances and appeals along with other detainees pertaining to this issue, and I've also spoken to numerous of officials pertaining to this problem on many occasions, and no results. The appeals usually say: There is a work order been placed to fix the shower. Sgt. Taylor said: The water is not going to be fixed, because the steam comes from somewhere else. One day in the day-room we the detainees questioning the inspector about, about the shower been cold after the first shower. He said: the shower is not going to be fixed, and that the earlier bird gets the worm. Well, I guess they were earnest about the situation, because some of the officials lead us on like the shower was going to be fixed. Superintendent N. Villanueva said it was going to be fixed. Until this day March 20, 2007 the hot-water have not been fixed. Cold-water, often limits detainees to fewer than 3 showers per-week, deprives the detainees of basic hygiene and threatens their physical, mental well-being. We have been deprived of our basic elements, which constitutes a denial of personal hygiene and sanitary living conditions. This is a violation of the detainees 14th Amendment due process of the law.

I Bobby Lee Harrison, and witnesses do declare under penalty of Perjury that the foregoing is true and correct to the best of our abilities: Date March 20, 2007 State of Illinois and City of Chicago

① Bree Williams #2003-0015588

② Brian Buchanan 20060004242

③ Amilcar Rodriguez 20050038475

④ James Gardner 20040053384

⑤ Charles Simmlon 20060042341

⑥ Charles Ester #20060010102

⑦ Marvin Powell 2006-0093725

⑧

Detainee

Signatures

Bobby Lee Harrison

Plaintiff Signature

Detainee Print names